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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

STATE OF CALIFORNIA, *et al.*,

Plaintiffs,

v.

NORRIS COCHRAN, Acting Secretary of
Health and Human Services, *et al.*,

Defendants,

and,

THE LITTLE SISTERS OF THE POOR,
JEANNE JUGAN RESIDENCE, *et al.*,

Defendant-Intervenors

Case No.: 4:17-cv-5783-HSG

**DECLARATION OF JUSTIN
SANDBERG IN SUPPORT OF
DEFENDANTS' MOTION TO STAY
ALL PROCEEDINGS**

I, Justin Sandberg, declare as follows:

1. I am a Senior Trial Counsel with the United States Department of Justice. I am an attorney of record in the above-captioned matter.

2. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.

3. I contacted counsel for plaintiffs and intervening defendants regarding this motion. Counsel for plaintiffs, Ketakee R. Kane, stated that that while Plaintiffs believe that this case is ready for adjudication, they would not oppose a stay if Federal Defendants filed a status report every 30 days, and if Plaintiffs retained the right to move for a decision on their pending motion for summary judgment in the event that no regulatory action had occurred within 60 days. Counsel for intervening defendant The Little Sisters of the Poor Jeanne Jurgan Residence, Mark Rienzi, stated that The Little Sisters oppose the proposed stay. Counsel for intervening defendant March for Life, Ken Connelly, stated that his client does not oppose the proposed stay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on March 1, 2021.

/s/ Justin M. Sandberg
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